

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF OKLAHOMA**

In re: BARBARA JEAN SHEPHARD,
Debtor.

Case Number: 10-13031 NLJ
Chapter 13

MOTION TO MODIFY CONFIRMED CHAPTER 13 PLAN

BARBARA JEAN SHEPHARD, Debtor in the above-captioned Chapter 13 proceeding, would herein request that the Court enter an order modifying the Chapter 13 Plan confirmed by the Court on January 7, 2011, pursuant to 11 U.S.C. §1329. Debtor(s) herein would propose the following modifications to the confirmed Chapter 13 Plan:

1. To provide that Debtor is current on plan payments through March 2011;
2. To provide for an increase in Debtor's plan payment to \$1,847.00 per month, beginning in April 2011; and
3. To provide that counsel for Debtor(s) receive \$350.00 for services rendered in this matter, to be paid at the rate of \$75.00 per month through the plan pursuant to the Guidelines and without the necessity of filing a fee application for the same.

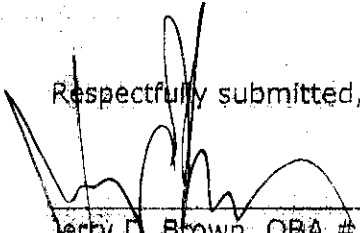
In support of this motion, Debtor(s) would respectfully state that her ongoing mortgage payment has increased post-confirmation, and her confirmed Chapter 13 Plan is no longer feasible.

WHEREFORE, given the above facts and arguments, Debtor(s) request that the Court enter an order modifying the confirmed Chapter 13 Plan, and for other such relief as the Court deems just and proper.

Barbara J. Shephard
Debtor

N/A
Joint Debtor (If Necessary)

Respectfully submitted,


Jerry D. Brown, OBA #16815
JERRY D. BROWN, P.C.
5500 N. Western Ave., Suite 150
Oklahoma City, OK 73118
(405) 841-1000

TIME FOR RESPONSE: Pursuant to Rule 3015(g) and 9006(f), Fed.R.Bankr.P., a written response must be served on the above-named attorney within twenty-four (24) days from the date of the filing of this motion, which includes the three days for mailing. Failure to respond within the time allowed may cause the pleading to be deemed confessed, and relief may be granted ex parte if a proposed order granting the relief is timely submitted to the Court.

CERTIFICATE OF SERVICE

I, Jerry D. Brown, hereby certify that on the 19th day of April, 11 a true and correct copy of the above and foregoing instrument was mailed, with proper postage prepaid (or served via ECF), to all interested parties listed below:

John T. Hardeman
Chapter 13 Trustee
PO Box 1948
Oklahoma City, OK 73101
VIA ECF

Office of the AUST
215 Dean A. McGee Ave.
Fourth Floor
Oklahoma City, OK 73102
VIA ECF

Barbara Jean Shephard
PO Box 1474
Purcell, OK 73080
VIA US MAIL

Joseph P. Gappa
OTC Legal Division
Assistant General Counsel
120 N Robinson Ste.
2000W
Oklahoma City, OK 73102-
7801
VIA ECF

Internal Revenue Service
Special Procedures
55 N. Robinson MS 5024
Oklahoma City, OK 73102-
3229
VIA US MAIL

AURORA LOAN SERVICES
10350 PARK MEADOWS
DRIVE
LITTLETON CO 80124-
0000
VIA US MAIL

MCCLAIN BANK
PO BOX 351
131 W MAIN
PURCELL OK 73080-0000
VIA US MAIL

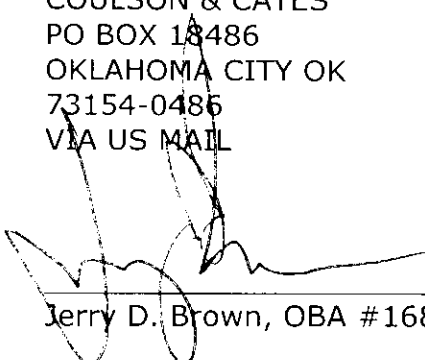
Jefferson Capital Systems
LLC
PO Box 7999
Saint Cloud, MN 56302-
0000
VIA US MAIL

Jim Timberlake
Baer & Timberlake
5901 N. Western #300
Oklahoma City, OK 73118
VIA US MAIL

BAER, TIMBERLAKE,
COULSON & CATES
PO BOX 18486
OKLAHOMA CITY OK
73154-0486
VIA US MAIL

Portfolio Recovery
Associates
PO Box 41067
Norfolk, VA 23541-0000
VIA US MAIL

US Dept of Education
PO Box 5609
Greenville, TX 75403
VIA US MAIL



Jerry D. Brown, OBA #16815